

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LONGHORN HD LLC.,

Plaintiff,

v.

BIOSTAR MICROTECH INT’L CORP.,

Defendant.

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Case No. 2:20-cv-00182-JRG-RSP

JURY TRIAL DEMANDED

**MOTION FOR ISSUANCE OF LETTERS ROGATORY FOR
SERVICE OF PROCESS ON DEFENDANT BIOSTAR MICROTECH INT’L CORP.**

Pursuant to Federal Rule of Civil Procedure 4(h)(2) and 4(f)(2)(B), Plaintiff Longhorn HD LLC. (“Longhorn”) respectfully requests that this Court issue a Request for Judicial Assistance (“Letters Rogatory”) (attached as Exhibit A), addressed to the appropriate judicial authority in Taiwan, requesting that the Taiwanese authority assist in effecting service of process upon Defendant Biostar Microtech Int’l Corp. (“Biostar”).

Longhorn filed its Complaint (Dkt. No. 1) on June 8, 2020. This Court issued a Summons as to Biostar on June 9, 2020. Upon information and belief, Biostar is a publicly-listed company with an address of 231 2F, No. 108-2, Min Chuan Road, Hsin Tien District, New Taipei City, Taiwan. Accordingly, Longhorn respectfully requests that this Court issue Letters Rogatory seeking the assistance of the Taiwanese authority in effecting service of the Complaint and Summons upon Biostar.

Longhorn respectfully requests that the Court return (a) the original copy of the signed and issued Letters Rogatory, and (b) two certified copies, to the undersigned counsel. The United States Department of State will oversee transmission of the Letters Rogatory to Taiwan

through diplomatic channels as provided in 28 U.S.C. § 1781(a)(2). Longhorn will reimburse this Court for any expenses incurred in connection with the issuance and return of the Letters Rogatory. Longhorn has retained the services of Legal Language Services, located at 8014 State Line Road, Suite 110, Leawood, KS 66208, to ensure delivery of materials and fees in accordance with U.S. and Taiwanese procedure.

Dated: July 29, 2020

Respectfully submitted,

/s/ Vincent J. Rubino, III
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***ATTORNEYS FOR PLAINTIFF
LONGHORD HD LLC.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 29, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Vincent J. Rubino, III
Vincent J. Rubino, III